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Joseph DelGreco

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EASTWEST INTERNATIONAL (TAIWAN): ENTERPRISES, a corporation formed under the laws of Taiwan (ROC); and VICTORIA: POINT CORPORATION, a corporation formed under the laws of the British Virgin Islands,

Case No.: 08-CIV-6124 (DAB)

NOTICE OF MOTION TO STAY

Plaintiffs,

-against-

JOSEPH DELGRECO & COMPANY, INC., a corporation formed under the laws of the State of New York; and JOSEPH DELGRECO, an individual,

Defendants.

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion to Stay Action in Favor of Arbitration, or, in the Alternative, Pending Arbitration, the accompanying Declaration of Cary B. Samowitz, dated August 6, 2008, and all other papers and proceedings in this matter, defendants JOSEPH DELGRECO & COMPANY, INC. and JOSEPH

DELGRECO, by their undersigned attorneys, DLA Piper US LLP, will move this Court before the Honorable Deborah A. Batts, in the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007 on a date to be determined by the Court for an order staying this action in its entirety as to all named parties in favor of arbitration and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York August 6, 2008

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